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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

10 **IN RE: UBER TECHNOLOGIES, INC.,**  
11 **PASSENGER SEXUAL ASSAULT**  
12 **LITIGATION**

No. 3:23-md-03084-CRB

**DECLARATION OF BRET STANLEY**  
**SUPPORTING BRET STANLEY'S**  
**ADMINISTRATIVE MOTION TO FILE**  
**UNDER SEAL PORTIONS OF RESPONSE**  
**TO MOTION FOR SANCTIONS**

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14  
15 This Document Relates to:  
16 All Cases  
17

Judge: Honorable Charles R. Breyer  
Courtroom: 6 – 17<sup>th</sup> Floor

1 I, Bret Stanley, declare:

2  
3 1. I am a Senior Counsel at the law firm of Johnson Law Group, LLP. I am a named member  
4 of the Plaintiffs' Steering Committee of MDL 3084, IN RE: UBER TECHNOLOGIES, INC.,  
5 PASSENGER SEXUAL ASSAULT LITIGATION. I am a member in good standing of the Bar  
6 of the State of Texas am admitted to practice before this Court. I know the following facts to be  
7 true of my own knowledge, except those matters stated to be based on information and belief. If  
8 called upon to testify, I could and would testify competently to the truth of the matters stated  
9 herein. I respectfully submit this declaration in support of Bret Stanley's Response to Defendants'  
10 Motion for Sanctions Against Bret Stanley. I have reviewed Uber's Motion for Sanctions Against  
11 Bret Stanley, including its attached Exhibits A, B, and C. Additionally, I have reviewed Uber's  
12 Administrative Motion to Seal Uber's Motion for Sanctions against Bret Stanley. (ECF 4232).  
13

14 2. Uber sought to have certain elements of their attorney time sealed from the public record,  
15 including the attorney hours worked, the billable time expended, and the descriptions of the time  
16 expended in a prior Administrative Motion to Seal. *See* ECF 4232.  
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18 3. The current publicly facing documents relating to Uber's Motion for Sanctions remain  
19 sealed concerning Uber's hours worked, the billable time expended, and the descriptions of the  
20 time expended.

21 4. Out of abundance of caution, I am filing the Response to Uber's Motion for Sanctions  
22 Against Bret Stanley with redactions applied to Uber's hours worked, the billable time expended,  
23 and the descriptions of the time expended. These redactions can be found on pages 13 and 14 of  
24 Bret Stanley's Response to Uber's Motion for Sanctions.  
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26 5. The Declaration in Support of Bret Stanley's Response to Uber's Motion for Sanctions  
27 likewise contains attorney hours worked, the billable time expended, and the descriptions of the  
28 time expended that are subject to Uber's Administrative Motion to Seal Portions of Uber's

1 Motion for Sanctions.

2 6. Out of abundance of caution, I am filing Bret Stanley's Declaration in Support of Bret  
3 Stanley's Response to Uber's Motion for Sanctions with redactions to Uber's attorney hours  
4 worked, the billable time expended, and the descriptions of the time expended that are subject to  
5 Uber's pending Administrative Motion to Seal Portions of Uber's Motion for Sanctions.  
6 Redactions to Bret Stanley's Declaration in Support of Bret Stanley's Response to Uber's Motion  
7 for Sanctions can be found in Paragraph's 61, 64, and 68 to the Declaration.  
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9 7. Exhibit A to Bret Stanley's Response to Uber's Motion for Sanction contains information  
10 found to be in breach of MDL 3084's Protective Order by this Court's Order on August 18, 2025  
11 (ECF 3708). Exhibit A lists the names of Knowledge Base Policies on pages 002-003. These  
12 names are being redacted per Court Order.  
13

14 8. Exhibit B to Bret Stanley's Response to Uber's Motion for Sanction contains information  
15 found to be in breach of MDL 3084's Protective Order by this Court's Order on August 18, 2025  
16 (ECF 3708). Exhibit B lists the names of internal systems on Page 002-004. Exhibit B also lists  
17 the names of Knowledge Base Policies on pages 005. This information is being redacted out of  
18 abundance of caution and consistent with prior Court order.  
19

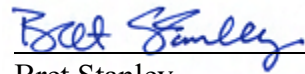
20 9. Exhibit E to Bret Stanley's Response to Uber's Motion for Sanction contains information  
21 found to be in breach of MDL 3084's Protective Order by this Court's Order on August 18, 2025  
22 (ECF 3708). Exhibit E lists the internal bates number of a Knowledge Base Policy 004. While  
23 bates numbers were not specifically found to be a breach of MDL 3084's Protective Order, this  
24 information is being redacted out of abundance of caution.

25 10. The limited redactions sought above are requested based on pending Administrative  
26 Motions to Seal or based on prior Court Orders. At this point, there are no less restrictive  
27 alternatives to sealing these documents.  
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I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 17<sup>th</sup> day of November, 2025 in Houston, Texas.

  
Bret Stanley